

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143
Honorable T.S. Ellis, III
Hearing: June 11, 2021
Trial: July 12, 2021

MOTION TO SEAL PORTIONS OF DEFENDANT'S RESPONSE

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order permitting portions of his Response to the government's Reply to his Opposition to the Government's Motion to Exclude Evidence at Trial be filed under seal. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

ZACKARY ELLIS SANDERS
By Counsel

Respectfully submitted,

/s/

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Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served this 11th day of June 2021, on all counsel of record.

/s/ Jonathan Jeffress
Jonathan Jeffress